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7 Attorney for Tony Williams

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 TONY WILLIAMS,
15 Defendant.
16

Case No. 2:14-cr-334-RFB-VCF

**UNOPPOSED MOTION TO
MODIFY CONDITIONS OF
PRETRIAL RELEASE**

17 Comes now the defendant, Tony Williams, by and through his counsel of record, Raquel
18 Lazo, Assistant Federal Public Defender, and hereby moves this court for an order to modify
19 his conditions of pretrial release. This motion is supported by the following Memorandum of
20 Points and Authorities.

21 DATED this 28 of September, 2015.

22 RENE L. VALLADARES
23 Federal Public Defender

24 By: /s/Raquel Lazo

25 RAQUEL LAZO
Assistant Federal Public Defender
26 Attorney for Tony Williams

MEMORANDUM OF POINTS AND AUTHORITIES

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2 1. On June 9, 2015, the defendant admitted to having violating his conditions of
3 pretrial release. This court released defendant from detention and modified his preexisting
4 conditions. Defendant was placed on home incarceration at the halfway house with GPS
5 monitoring. See Minutes (#81).

6 2. The defendant seeks to remove the Location Monitoring Condition of GPS
7 monitoring and Home Incarceration. He has been fully compliant since he last appeared in
8 court.

9 3. Pretrial Services Officer Barlow has no opposition. She does not believe that
10 the location monitoring or the lock-down restriction is necessary. However, for now, she
11 continues to recommend continued placement at the halfway house is still necessary.

12 4. The government has no opposition.

13 DATED this 28th day of September, 2015.

14 RENE L. VALLADARES
15 Federal Public Defender

16 */s/ Raquel Lazo*

17 By: _____
18 RAQUEL LAZO,
19 Assistant Federal Public Defender
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TONY WILLIAMS,

7 Defendant.

Case No. 2:14-cr-334-RFB-VCF

8 **PROPOSED ORDER**

9
10 IT IS HEREBY ORDERED that Defendant Tony Williams, have his Location
11 Monitoring removed and Home Incarceration lifted.

12 DATED this 28th day of September, 2015.

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15 RICHARD F. BOULWARE, II
16 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on September 28, 2015, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
ALEXANDRA M. MICHAEL
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Karen Meyer

Employee of the Federal Public Defender